

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

PETER STOCK,

Plaintiff,

-against-

FIERA CAPITAL INC.,

Defendant.

Case No.: 24-cv-6888 (JGK)

**REVISED FRCP 26(f) REPORT  
AND SCHEDULING ORDER**

Plaintiff Peter Stock (“Plaintiff”) and Defendant Fiera Capital Inc. (“Fiera”), by and through their undersigned counsel, after meeting and conferring on November 18, 2024, jointly submit this report pursuant to Rule 26(f) of the Federal Rules of Civil Procedure:

**1. Proposed Litigation Schedule:**

The parties propose the following schedule:

<b>Task</b>	<b>To Be Completed By:</b>
• Serve Employment Protocol Disclosures	• December 12, 2024
• Serve requests for production and interrogatories	• January 3, 2025
• Serve objections and responses to requests for production and interrogatories	• January 24, 2025
• Completion of fact depositions	• May 2, 2025
• Completion of fact discovery	• May 2, 2025
• Parties to submit pre-motion letters requesting permission to file for summary judgment	• May 23, 2025
• Parties respond to pre-motion letters	• May 30, 2025
• Completion of expert discovery	• 90 days after the Court issues a ruling on motion for summary judgment, or July 2, 2025 if no such motion made

**2. Subjects on Which Discovery May be Needed:**

The parties anticipate conducting discovery into Fiera's decision to terminate Plaintiff's employment, Plaintiff's performance as an employee of Fiera, Plaintiff's attempts to secure employment after his separation from Fiera, and Plaintiff's damages.

**3. Issues Related to Electronically Stored Information:**

The parties continue to discuss the production of electronically stored information and will bring any issues to the Court's attention during the December 12, 2024 conference.

**4. Issues Related to Privilege or Other Protections:**

The parties do not anticipate any issues relating to privilege or other protections at this time, except that prior to producing documents in response to requests for production the parties anticipate submitting to the Court a proposed protective order and stipulation of confidentiality governing the use of any confidential documents or information produced in the course of the litigation.

**5. Amendments to Pleadings and Parties:**

Except for good cause shown:

1. No additional parties may be joined or cause of action asserted after December 19, 2024.
2. No additional defenses may be asserted after December 19, 2024.


**6. Trial:**

The parties anticipate that this case will be ready for trial within 60 days following the completion of expert discovery. The estimated trial time is 3 days, and this is a bench trial (although Plaintiff initially made a jury demand, he now waives the right to a jury). The parties do not consent to a trial before a Magistrate Judge at this time.

Respectfully submitted this 3<sup>rd</sup> day of March, 2025.

BERGER WEBB HONE & ROGIN, LLP

EPSTEIN BECKER & GREEN, P.C.

By: \_\_\_\_\_  
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By: /s/ David W. Garland\_\_\_\_\_  
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**SO ORDERED.**

**Dated:        March 4, 2025**  
                  **New York, New York**

          /s/ John G. Koeltl            
                  **John G. Koeltl, U.S.D.J.**

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